

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:	§	
	§	CASE NO. 20-51780-rbk
EARTH ENERGY RENEWABLES, LLC	§	
	§	CHAPTER 11;
DEBTOR	§	SUBCHAPTER V
	§	

DEBTOR'S STATUS REPORT

TO THE HONORABLE RONALD B. KING, CHIEF UNITED STATES BANKRUPTCY JUDGE:

COMES NOW Earth Energy Renewables, LLC, Debtor-in-Possession, and files this its Status Report pursuant to 11 USC § 1188 (c) and respectfully states the following:

1. This case was commenced by the filing of a voluntary petition under Chapter 11, Subchapter V, on October 20, 2020.
2. The Debtor is a Texas limited liability company in the bio-chemical business and employs engineers, technicians, support staff and management. At this time, the Debtor continues to operate its business and manage its assets as a debtor in possession pursuant to §§ 1107 and 1108 of the Bankruptcy Code.
3. The case was filed due to a notice of default sent by Ara EER Holdings, LLC seeking to seize all of the Debtor's intellectual property.
4. The Initial Debtor Interview with the U.S. Trustee's Office was held on November 4, 2020. The meeting of creditors is scheduled for November 20, 2020 at 11:00 a.m.
5. The Debtor-in-Possession bank accounts were opened on November 4, 2020. All deposits and disbursements are made into and from the DIP accounts.

6. The Debtor maintains all insurance required by the U.S. Trustee, including casualty, business personal property, automobile, workers compensation, directors and officers liability and general liability coverage.

7. The Debtor sought and obtained authority to pay its regular October 30, 2020 payroll and associated payroll taxes. There appear to be no creditors with a lien on cash collateral at this time.

8. The Debtor sought and obtained authority to borrow \$60,000 on an unsecured, non-priority basis on October 30, 2020.

9. The Debtor sought and obtained an extension to file its Schedules and Statements of Financial Affairs until November 13, 2020.

10. Counsel for the Debtor and the Subchapter V Trustee, Eric Terry, have been in regular contact. Counsel for the Debtor intends to work closely with Mr. Terry to obtain a consensual plan.

11. The deadline for the Debtor to file its plan is January 11, 2021.

Dated: November 10, 2020.

Respectfully submitted by:

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By: /s/ Frank B. Lyon
FRANK B. LYON
State Bar No. 12739800
ATTORNEY FOR DEBTOR,
Earth Energy Renewables, LLC

Certificate of Service

I, Frank B. Lyon, the attorney for the Debtor, hereby certify that on the 10th day of November, 2020, a true and correct copy of the foregoing Status Report was served on the parties below by the methods indicated and will be served on the parties on the attached matrix by first class US mail, except those served via the Court's CM/ECF system, on November 11, 2020.

Office of the US Trustee

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Via ECF notification

Subchapter V Trustee

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/s/ Frank B. Lyon

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